

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF NATALIE ROMERO IN SUPPORT OF PLAINTIFFS’
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Natalie Romero, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. I am a resident of Charlottesville, Virginia. I have lived in Charlottesville, Virginia for the last five years while I was attending the University of Virginia. I graduated last fall with a Bachelor of Arts degree in Global Development Studies and Sociology.
5. I am employed by Virginia Organizing, which is located on Concord Avenue in Charlottesville, Virginia. I work full time at Virginia Organizing's office. My office is a five minute drive from my home.
6. I was recently awarded the inaugural Freeman Artist Residency. As part of that residency, I was awarded a studio in the Carlton area of Charlottesville, Virginia. On average, I visit my studio five days a week. My studio is my safe space where I create art, read, think, and heal. I feel safe and supported in my studio. My art is a form of therapy and a cathartic exercise that has allowed me to cope with the physical, mental, and emotional trauma that I suffered as a result of the events of August 11-12, 2017. My studio is an eight minute drive from my home.
7. During the global COVID-19 pandemic, my family, including my mother, brother, aunt, cousin, and two goddaughters moved to Charlottesville, Virginia and began living

with me and my wife. I assumed a number of additional personal responsibilities thereafter. For example, I drive my brother to work every day because he does not have a driver's license. I also have childcare responsibilities for my two young goddaughters.

8. Moving the trial to either Lynchburg, Virginia or Roanoke, Virginia, would present an enormous hardship for me emotionally, physically, professionally, and personally.

9. Among other severe physical injuries, I suffered a fractured skull and concussion when Defendant James Fields' car struck me on August 12, 2017. In the wake of the car attack, I was diagnosed with PTSD, acute anxiety, and stress. I suffer from extreme anxiety when traveling in cars as a result of the car attack. I limit my driving to a 2-3 mile radius within Charlottesville and have not been alone in a car for a drive longer than that since August 12, 2017. The idea of driving by myself from Charlottesville to Lynchburg or Roanoke to participate in trial is terrifying, and I do not have a family member or friend who can take off from work in order to drive me to and from either Lynchburg or Roanoke each day. As a result, I would have to seek lodging in either location for the duration of the trial. That would be an enormous monetary burden for me as a recent college graduation on a very tight budget who provides financial support for younger family members.

10. In addition, it is my understanding that the COVID-19 vaccination rate is far lower in Lynchburg and Roanoke than it is in Charlottesville. I care for younger family members who cannot be vaccinated and being in an area with a higher COVID-19 infection rate and a lower vaccination rate concerns me greatly.

11. In addition, being in Lynchburg or Roanoke for trial would take me away from my entire emotional support system. I anticipate that preparing for and testifying at trial will exacerbate my PTSD and trigger me emotionally. My closest family members live in

Charlottesville, Virginia. My friends who helped me recover from my physical injuries and provided me with ongoing emotional support are all in Charlottesville, Virginia. I have an emotional support dog certified by my physician that I would have to leave in Charlottesville if trial were held in Lynchburg or Roanoke.

12. If trial were held in Lynchburg or Roanoke that would deprive me of the ability to visit my art studio, which is my creative outlet to deal with my trauma, anxiety, and stress.

13. It will also be impossible for me to meet my professional and personal obligations if trial is held in Lynchburg or Roanoke.

14. In addition, my family only has a single vehicle. If I take that vehicle to Lynchburg or Roanoke for trial my family will be without transportation for that time period.

15. I have never been to Lynchburg and I have no connections whatsoever to either Lynchburg or Roanoke.

16. It is incredibly important to me that the trial occurs in Charlottesville. I am a community organizer and I firmly believe that the Charlottesville community deserves the chance to heal.

17. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 11, 2021, in Charlottesville, Virginia.

A handwritten signature in black ink, appearing to read 'Natalie Romero', is written over a horizontal line.

Natalie Romero